

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE EASTERN DISTRICT OF OKLAHOMA**

(1) WAGNER & LYNCH, PLLC,)	
)	
Plaintiff,)	
)	Case No.: CIV-23-226-JAR
vs.)	
)	<i>Removed from the District Court of</i>
(1) GREAT LAKES INSURANCE SE,)	<i>Latimer County, Oklahoma</i>
)	<i>Case No. CJ-2023-18</i>
Defendant.)	

**DEFENDANT GREAT LAKES' RESPONSE TO
PLAINTIFF'S MOTION TO DISMISS (DKT. # 14)**

Defendant Great Lakes Insurance SE ("Great Lakes") hereby submits its Response to Plaintiff's Notice of Dismissal (Dkt. # 14), which was construed as a Motion to Dismiss by the Court in its Minute Order (Dkt. # 16) on August 22, 2023.

Defendant Great Lakes has no objection to Plaintiff's dismissal and consents to dismissal of this matter upon the Court's proper findings and order. Such dismissal is proper under 41(a)(2) for the following reasons: 1) Defendant has not pleaded a counterclaim in this case, 2) Defendant is not seeking costs or fees in this case, and 3) this case is duplicative, as the issues are already before this court in Case No. CIV-23-00052-JAR, *Great Lakes Insurance SE v. Wagner & Lynch, PLLC*. For these reasons, Defendant has no objection to Plaintiff's Notice of Dismissal.

By: s/ Alexandra J. Gage
Michael S. Linscott, OBA No. 17266
Alexandra J. Gage, OBA No. 33874
DOERNER, SAUNDERS, DANIEL
& ANDERSON, L.L.P.
Two West Second Street, Suite 700
Tulsa, OK 74103-3117
Telephone 918.591.5271
Facsimile 918.925.5271

Attorneys for Defendant Great Lakes Insurance SE

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of August, 2023, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Wes.foundationlaw@gmail.com

s/ Alexandra J. Gage

Alexandra J. Gage

8045241.1